

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

**IN RE C.R. BARD, INC.,** MDL NO. 2187  
**PELVIC REPAIR SYSTEM PRODUCTS**  
**LIABILITY LITIGATION**

**IN RE AMERICAN MEDICAL SYSTEMS,** MDL NO. 2325  
**PELVIC REPAIR SYSTEM PRODUCTS**  
**LIABILITY LITIGATION**

**IN RE BOSTON SCIENTIFIC CORP.,** MDL NO. 2326  
**PELVIC REPAIR SYSTEM PRODUCTS**  
**LIABILITY LITIGATION**

**IN RE ETHICON, INC.,** MDL NO. 2327  
**PELVIC REPAIR SYSTEM PRODUCTS**  
**LIABILITY LITIGATION**

**IN RE COLOPLAST CORP.,** MDL NO. 2387  
**PELVIC REPAIR SYSTEM PRODUCTS**  
**LIABILITY LITIGATION**

**IN RE COOK MEDICAL, INC.,** MDL NO. 2440  
**PELVIC REPAIR SYSTEM PRODUCTS**  
**LIABILITY LITIGATION**

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**THIS DOCUMENT RELATES TO ALL CASES**

**MOTION TO SUBSTITUTE AND WITHDRAW COUNSEL**  
**AND FOR CHANGE OF ADDRESS**

**TO THE HONORABLE JUDGE OF THIS COURT:**

PLEASE TAKE NOTICE that Kell Lampin, LLC, by and through its undersigned counsel, respectfully move this Court for entry of an Order **withdrawing Daniel A. Raniere, the current counsel for clients in the above-referenced matter, and substituting by consent Attorney Daniel A. Raniere with Attorney J. Mark Kell as counsel** and updating the firm's address both in MDL Nos. 2187, 2325, 2326, 2327, 2387, and 2440 in the main MDL and for every member

case associated with these MDLs. The telephone numbers and e-mail addresses for the Kell Lampin Attorneys remain unchanged. The fax number has changed.

The Kell Lampin Attorneys in this matter relocated their offices to:

Kell Lampin, LLC  
14500 S. Outer Forty, Suite 407  
Chesterfield, MO 63017  
(636) 498-4878 phone  
(636) 489-3971 fax

Accordingly, Kell Lampin respectfully requests that the Court enter an Order updating the firm's address and contact information, withdrawing Daniel A. Raniere as counsel and substituting J. Mark Kell as counsel, as well as updating each member case in which any of the named attorneys have been associated in MDL Nos. 2187, 2325, 2326, 2327, 2387, and 2440 in the main MDL and for every member case associated with these MDLs.

Dated: January 12, 2017

By: /s/ Daniel A. Raniere  
Daniel A. Raniere (Mo. Bar No. 27027)  
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AND

/s/ J. Mark Kell  
J. Mark Kell (Mo. Bar No. 26413)  
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**CERTIFICATE OF SERVICE**

I hereby certify that on January 12, 2017, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF System which will send notification of such filing to all counsel of record.

/s/ Daniel A. Raniere